

Critical Review of Mobile Emissions from EPA 2011 NEI: Part Two – Regional VMT/VPOP Activities

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MOVES Activities

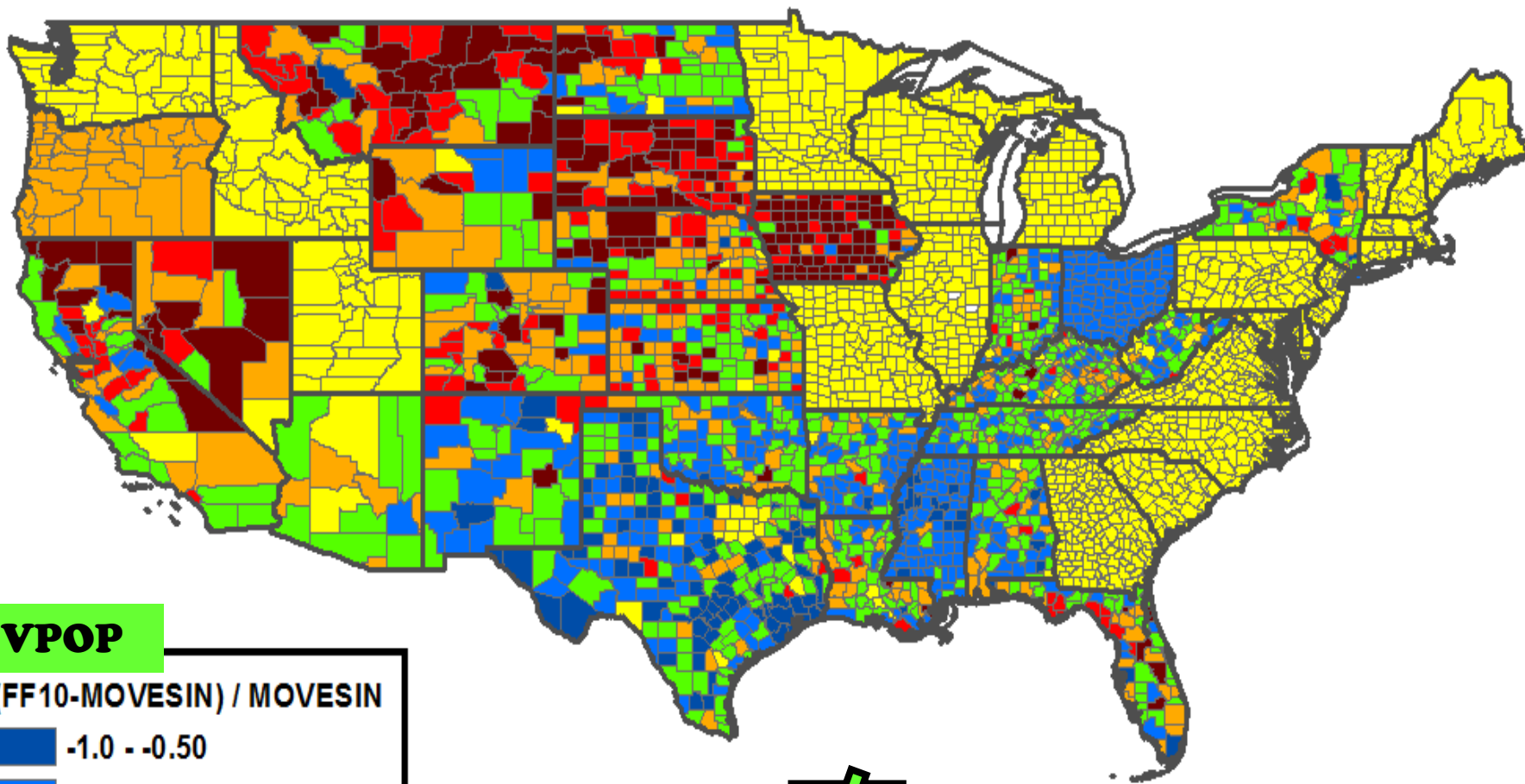
- **States provided MOVES activity data (VMT, VPOP) via EIS as part of 2011NEI submittal**
- **MOVES County Database tables (CDBs) containing activity data (in MySQL format) for all counties in the US (>3200) were made available by EPA**
- **SMOKE requires VMT/VPOP by SCC at individual county resolution as model input (i.e., FF10)**
- **County-wide FF10 were made available in 2011NEI modeling platform**

MOVESIN = inputs to MOVES

FF10 = inputs to SMOKE

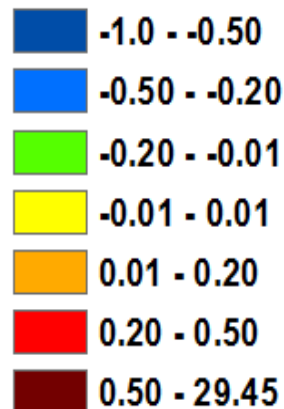
$$\% = (\text{FF10} - \text{MOVESIN}) / \text{MOVESIN}$$

Violation of Conservation Principle in EPA's 2011 NEI -- VPOP



VPOP

$(FF10 - MOVESIN) / MOVESIN$

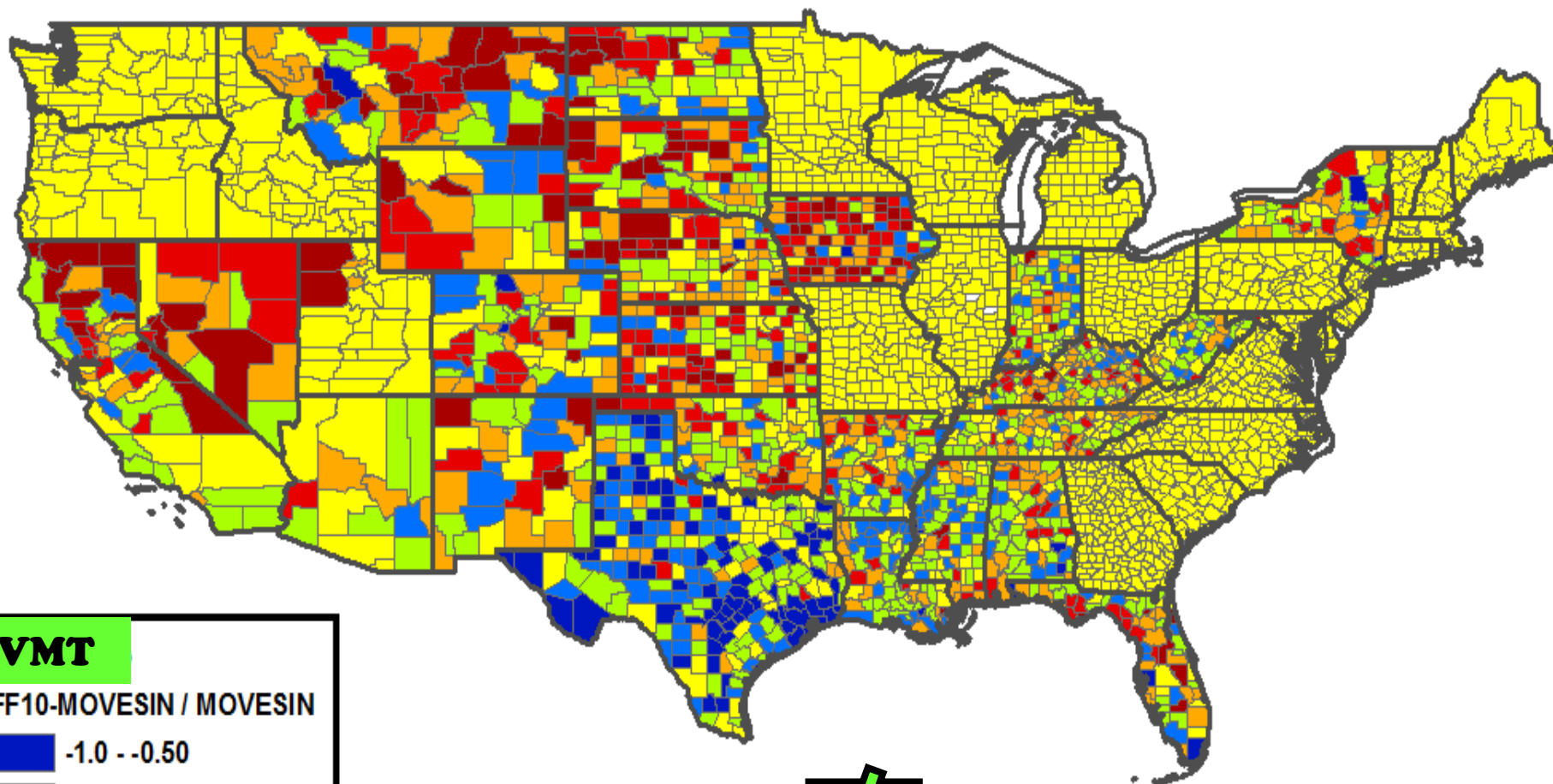


MOVES inputs \neq SMOKE inputs

Differences range from -100% to +2900%!

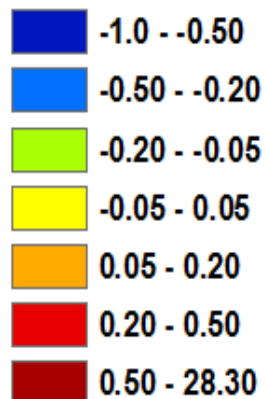
**Vehicle loss in east/south (SMOKE < MOVES);
Vehicle gain in west/north (SMOKE > MOVES)**

Violation of Conservation Principle in EPA's 2011NEI -- VMT



VMT

FF10-MOVESIN / MOVESIN



MOVES inputs \neq SMOKE inputs


Differences range from -100% to +2800%!

Yellow (-0.05 – 0.05) should not be viewed as exact agreement. Every county has either a VMT loss or a VMT gain

Discussion on Activities

- **164 CDBs used for nation-wide representative counties were identical to those submitted to EIS in individual county, indicating no VPOP/VMT aggregation in 2011NEI MOVES runs**
- **The practice of no aggregation is contradictory to MOVES2010 Technical Guidance (Section 3.3.1 and Section 3.5.1):**
 - “If the lookup table results will be applied to a large number of counties, use the **total** source type population for all the counties covered. “
 - “If the lookup table results will be applied to a large number of counties, use the **total** VMT for all the counties covered. “
- **Due to input requirements, a methodology allocating VMT/VPOP to SCC must be adopted in order to prepare SMOKE inputs**

Discussion on Activities (cont.)

- **The allocation of VMT and VPOP by SCC is important in emission estimates:**
ex. 1000 VMT for HDDV  1000 VMT for LDGV
- **For states that did not provide data:**
 - **What was the source for the activity data?**
 - **How were VMT and VPOP by SCC developed?**
- **For states that did provide data:**
 - **Differences in VPOP should be near zero (slight loss is due to CNG vehicles)**
 - **How were VMT and VPOP by SCC developed?**
- **VMT and VPOP, while considered “dummy” in the representative county lookup table approach, have an effect on emission rates. The magnitude of this impact is unknown.**
- **Activity data must be conserved throughout the process**

Problems with EPA 2011 NEI

- **Activities were not aggregated**
- **Unknown methods for allocating activities by SCCs**
- **Many states provided no data**
- **Activities are not conserved**

Recommendations

- **Implement the new SCC algorithm at once -- in 2011NEI version2 and in MOVES2014. This should eliminate the need for activity allocations and eradicate conservation problem**
- **It is more effective if EPA reaches out to “missing” states to obtain local state-specific data, rather than try to develop new defaults in lieu of missing data (improvements from improved defaults are likely minimal)**
- **Until full impact is assessed and quantified, activities should be aggregated over group counties to comply with MOVES guidance**
- **Phase out representative county approach**